



KAUFMAN BORGEEST & RYAN LLP

120 BROADWAY, NEW YORK, NY 10271
TEL: 212.980.9600 FAX: 212.980.9291 WWW.KBRLAW.COM

October 8, 2019

JOAN M. GILBRIDE
DIRECT: 212.994.6517
JGILBRIDE@KBRLAW.COM

VIA ECF

Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Deon Gittens v. Winthrop Hospitalist Associates, P.C., NYU Winthrop Hospital, NYU
Langone Health System and Doris McKeon
Civil Action No.: 19-cv-05070 (LDH) (PK)

Dear Judge Hall:

We represent Defendants Winthrop Hospitalist Associates, P.C., NYU Winthrop Hospital, NYU Langone Health System and Doris McKeon (collectively "Defendants") in the above-referenced matter. Defendants' response to Plaintiff's Complaint is due on October 10, 2019. Pursuant to Paragraph IV(A) of Your Honor's Individual Practice Rules, we write with the consent of Plaintiff's counsel¹ to request an extension of time to answer, or otherwise respond to, Plaintiff's Complaint, up to and including November 11, 2019. Defendants request this extension to allow sufficient time to fully investigate and respond to Plaintiff's allegations. This is Defendants first request for an extension of time to respond to Plaintiff's Complaint. This request does not affect any future dates scheduled in this matter.

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP

A handwritten signature in black ink, appearing to read 'Joan M. Gilbride', written over the printed name.

Joan M. Gilbride

cc. (via ECF)

Marjorie Mesidor, Esq.
Attorneys for Plaintiff

¹ The parties agree to confer prior to Defendants' submission of a pre-motion letter, if such a letter is to be submitted to the Court.